

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-MC-20707-JEM/BECERRA

In re: Application Pursuant to
28 U.S.C. § 1782 of

FARHAD AZIMA
5921 Ward Parkway
Kansas City, Missouri 64113,

Petitioner,

v.

INSIGHT ANALYSIS AND RESEARCH, LLC
13727 SW 152 Street, #715
Miami, Florida 33177,

SDC-GADOT, LLC
3200 Collins Avenue, Suite L2
Miami Beach, Florida 33140,

and

AMIT FORLIT
5-A Habarzel Street
Tel Aviv, Israel 6971002 IL,

Respondents.

**PETITIONER'S SUPPLEMENTAL APPLICATION FOR AN ORDER PURSUANT
TO 28 U.S.C. § 1782 TO TAKE DISCOVERY HELD BY AMIT FORLIT**

In compliance with D.E. 21 and pursuant to 28 U.S.C. § 1782 and Fed. Rule of Civ. Proc. 45, Petitioner Farhad AZIMA respectfully submits this supplemental application, moving this Court for an order permitting Petitioner to issue subpoenas compelling respondent Amit FORLIT to produce documents and be deposed in the Southern District of Florida. Such discovery is relevant to, and would be used in connection with, a case pending in the High Court of Justice of England and Wales, that is, Farhad Azima -v- (1) RAKIA (2) David Neil Gerrard (3) Dechert LLP

and (4) James Edward Deniston Buchanan (Claim Number: HC-2016-002798) (the “UK Proceeding”).

Notably, this Court previously granted the Petitioner’s request to take discovery of two active Florida-incorporated entities incorporated and managed by FORLIT, Insight Analysis & Research LLC (“Insight”) and SDC-Gadot LLC (“Gadot”) (D.E. 5).¹ Key business transactions relevant to the UK Proceeding involve Insight and Gadot. These entities, however, have failed to comply with subpoenas requesting document production and witness testimony.

As explained further in the accompanying and supporting memorandum of law, discovery from FORLIT is necessary to aid in the UK Proceeding and should be permitted in this District because: (a) the requirements of Section 1782 are met, including that FORLIT be “found” in Florida; (b) Insight and Gadot are mere instrumentalities or “alter egos” of FORLIT, so he should appear in Florida, as they would; and (c) Florida’s long-arm statute and the Fourteenth Amendment’s Due Process clause allows for FORLIT to be brought here for discovery. In addition, the four discretionary factors identified by the United States Supreme Court in *Intel Corp. v. Advanced Micro Devices, Inc.*, 542 U.S. 241, 264-65 (2004), all weigh in favor of granting this supplemental application.

Thus, Petitioner respectfully requests this Court to enter an order:

1. Granting this supplemental application for discovery from FORLIT pursuant to 28 U.S.C. § 1782;

¹ This Supplemental Application and accompanying memorandum of law in support thereof addresses why Respondent FORLIT has been added.

2. Authorizing Petitioner to take discovery from FORLIT relating to the issues identified in his supplemental application, including issuing subpoenas for (a) the deposition of FORLIT and (b) the production of documents related to matters pending in the UK Proceeding;
3. Directing FORLIT to comply with such subpoenas in accordance with the Federal Rules of Civil Procedure and the Rules of this Court; and
4. Appointing the undersigned to issue, sign and serve such subpoenas upon FORLIT.

A proposed order is attached to the memorandum of law as **Ex. N**, for the Court's consideration.

Respectfully submitted,

Dated: June 10, 2022

s/ Vanessa Singh Johannes
Michael S. Pasano (FBN 475947)
Email: MPasano@carltonfields.com
Vanessa Singh Johannes (FBN 1028744)
E-mail: VJohannes@carltonfields.com
CARLTON FIELDS P.A.
700 N.W. 1st Avenue, Suite 1200
Miami, Florida 33136-4118
Telephone: (305) 530-0050

s/ Ian Herbert
Kirby D. Behre (admitted *pro hac vice*)
Timothy P. O'Toole (admitted *pro hac vice*)
Ian A. Herbert (admitted *pro hac vice*)
Calvin Lee (admitted *pro hac vice*)
MILLER & CHEVALIER CHARTERED
900 16th Street, NW
Washington, D.C. 20006
Telephone: (202) 626-5800
Fax: (202) 626-5801
Email: kbehre@milchev.com

Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2022, a true and correct copy of the foregoing document was filed via CM/ECF and served on counsel for Mr. Forlit, Christopher S. Salivar and Elan I. Baret, via such means. In addition, service was made, via the following e-mail address, to the representative agent for the Respondents:

INSIGHT ANALYSIS AND RESEARCH LLC
13727 SW 152 Street #715
Miami, Florida 33177
c/o Shimon Goldberg
Manager's Office
3200 Collins Ave.
Miami Beach, FL 33140
shimon@srsmanagement.com

SDC-GADOT LLC
3200 Collins Ave., Suite L2
Miami Beach, Florida 33140
c/o Shimon Goldberg
Manager's Office
3200 Collins Ave.
Miami Beach, FL 33140
shimon@srsmanagement.com

s/ *Vanessa Singh Johannes*
Vanessa S. Johannes